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*Attorneys for Defendants Praetorium Secured  
 Fund I, L.P., and George V. Cresson*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

KEEHAN TENNESSEE INVESTMENTS,  
 LLC; DAVID KEEHAN; DONALD J.  
 KEEHAN, SR.; DURHAM RIDGE  
 INVESTMENTS, LLC; WESTLAKE  
 BRIAR, LLC; KEEHAN TRUST FUNDING,  
 LLC; DONALD J. KEEHAN JR.; 951  
 REALTY LTD.,

Plaintiffs,

vs.

GUARDIAN CAPITAL ADVISORS, INC.;  
 PRAETORIUM SECURED FUND, I, L.P.;  
 GEORGE V. CRESSON, Individually and  
 dba DEVELOPMENT FINANCE, LP;  
 KENNETH A. MILLER,

Defendants.

Case No: 3:14-cv-00500-RCJ-WGC

**NOTICE OF LACK OF DIVERSITY  
 JURISDICTION**

Defendants PRAETORIUM SECURED FUND I, L.P., and GEORGE V. CRESSON,  
 individually and doing business as Development Finance, L.P. ("Praetorium Defendants"), by  
 and through their counsel, the law firm of Lewis Roca Rothgerber LLP, file the instant Notice of  
 Lack of Diversity Jurisdiction in response to this Court's Order entered on January 21, 2015  
 (Doc. # 71).

On January 21, 2015, this Court ordered that Defendants conduct jurisdictional discovery  
 and file an amended statement of removal to show that subject matter jurisdiction lies under  
 sections 1332(a) and 1441(a). *See generally* Doc. # 71. This Court was specifically concerned  
 about whether complete diversity existed between the parties in this case due to the several party-

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1 unincorporated associations whose citizenships had not been alleged in the Complaint. *See* Doc.  
2 # 71 at 1. Pursuant to this Court's Order, *see id.* at 3, Praetorium Defendants served Plaintiffs  
3 and Co-Defendants with jurisdictional interrogatories, the responses of which have revealed that  
4 complete diversity does not exist among the Plaintiffs and Defendants in this case. Accordingly,  
5 Praetorium Defendants notify this Court that diversity jurisdiction is lacking.

6 Dated this 18th day of February, 2015.

7 LEWIS ROCA ROTHGERBER LLP

8  
9 By /s/ Kristen L. Martini

10 David C. McElhinney, Esq., SBN 0033

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12 Kristen L. Martini, Esq., SBN 11272

13 *Attorneys for Defendants Praetorium Secured*  
14 *Fund I, L.P. and George V. Cresson*  
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**CERTIFICATE OF SERVICE**

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that service of:  
**NOTICE OF LACK OF DIVERSITY JURISDICTION** was made this date by Electronic  
 Mail and U.S. Mail, postage prepaid, in Reno, Nevada, to the following:

Bret F. Meich, Esq. Richard G. Campbell, Jr., Esq. ARMSTRONG TEASDALE LLP 3770 Howard Hughes Parkway, Suite 200 Las Vegas, NV 89169 <i>bmeich@armstrongteasdale.com</i> <i>rcampbell@armstrongteasdale.com</i>	Edmund W. Searby, Esq. Mary P. Birk, Esq. BAKER & HOSTETLER 1900 E. 9 <sup>th</sup> Street, Suite 3200 PNC Center Cleveland, OH 44114-3482 <i>esearby@bakerlaw.com</i> <i>mbirk@bakerlaw.com</i>
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DATED this 18th day of February, 2015.

*Rebecca Law*

An Employee of Lewis Roca Rothgerber LLP